



CLOW WATER SYSTEMS COMPANY

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January 12, 2007

Air and Radiation Division  
US EPA Region 5  
77 West Jackson Boulevard (A-18J)  
Chicago, IL 60604



Ohio EPA  
Abdur Rahim  
122 South Front Street  
Columbus, OH 43215

Subject: Semi-Annual Compliance Report – 2nd Half of 2006

This letter will serve as the semi-annual compliance report as required by 40 CFR Part 63, Subpart EEEEE (Iron and Steel Foundry MACT) per 63.7751. Facilities subject to the Iron and Steel Foundry MACT are required to prepare and operate at all times according to a written plan for the selection and inspection of iron and steel scrap no later than April 22, 2005. This compliance report covers the period from June 30, 2006 through December 31, 2006.

There were no deviations from the Clow Water Systems Company implemented Scrap Inspection Program during this reporting period.

Compliance with emissions limitations, operation and maintenance requirements, and additional work practices is not required by the Iron and Steel Foundry MACT until April 23, 2007.

Based on information and belief formed after reasonable inquiry, the statements and information in this report are true, accurate, and complete.

Sincerely,

Heather A. Klesch  
Interim Environmental Manager  
Clow Water Systems Company